



February 13, 2015

Co-Chair Ted Kennedy  
Co-James Albis  
Senator Clark Chapin  
Representative John Shaban

Environment Committee:

We are submitting testimony on **H.B. 6730**, AN ACT CONCERNING THE ENFORCEMENT OF STAGE I VAPOR RECOVERY RESTRICTIONS AND SULFUR CONTENT REQUIREMENTS FOR DISTILLATE FUELS.

The Connecticut Energy Marketers Association (CEMA) represents 576 petroleum marketers and their associated business in Connecticut. CEMA members employ over 13,000 people in our state.

H.B. does not provide a timeframe specified between when the Department of Energy and Environmental Protection (DEEP) identifies a violation and when a disabling device will be placed on the dispensers. Instead of going directly to placing a “disabling device”, we’d like to see the DEEP allow a “right to cure” time period of 30 days where the owner/operator would be able to make the correction and provide the necessary paperwork to avoid a shutdown.

It is unclear whether Section 4 is allowing the owner/operator to self-certify a return to compliance with an affidavit and then can return a system to service without first receiving DEEP approval, or if DEEP must still provide approval for the return to service after an affidavit is provided. Owner/operators should be able to return to service immediately after rectifying any potential violations, and if submittal of an affidavit is required to do so, then immediately upon submittal of the affidavit, without having to wait for DEEP approval.

We would also like the committee to consider adding language to have the option for the testing vendor to provide the affidavit.

Finally, clarification is needed on what disabling “device” will be used? If businesses are indeed allowed to self-certify and resume operation upon submittal of an affidavit, without DEEP having to approve the submittal, then we want to ensure that we have the ability to remove the “device”..

CEMA asks that the Environment Committee to work with us on making changes to **H.B. 6730, AN ACT CONCERNING THE ENFORCEMENT OF STAGE I VAPOR RECOVERY RESTRICTIONS AND SULFUR CONTENT REQUIREMENTS FOR DISTILLATE FUELS** and adopt the suggestions we provided in our testimony.

Respectfully,

A handwritten signature in black ink, appearing to read "Christian A. Herb", written over a light blue horizontal line.

Christian A. Herb  
President